DRAFT

Mr. Valmichael Leos, Remedial Project Manager
U.S. EPA (6SF-RL)
1445 Ross Ave.
Dallas, TX 75202

Subject: San Jacinto River Waste Pits Superfund Site – Comments on Time Critical Removal Action

Dear Mr. Leos,

Harris County appreciates the opportunity to comment on initial, preliminary information and requests related to the Time Critical Removal Action for the San Jacinto River Waste Pits Superfund Site (SJRWPSS) located in Harris County, Texas. Harris County's SJRWPSS Technical Team comprising members of Public Health and Environmental Services, Public Infrastructure Department and the County Attorney's Office submit the following comments.

1. To assist in defining an "extreme weather event" for this Time Critical Removal Action, we note that standard design practices require structures whose failure would adversely affect human health or the environment to be built at or above 100-year flood event. We ask that the EPA consider the design of the time critical containment require a 100-year flood event (1%) at a minimum or higher. The design should take into consideration both the water surface elevation and river's flow velocity for that design event. The 100-year (1%) floodplain elevation in the area of this site ranges from under 13 feet to almost 14 feet (NAVD 1988). See attached portions of the current FEMA Flood Insurance Rate Map (FIRM) for reference.

2. The sampling plan had limits in that it only scratched the surface of the problem. The area to be covered by short-term containment should be as expansive based on other data and evidence available. Our interpretation of the preliminary analysis of samples taken April 13th through 15th, 2010 is that the waste fill is currently defined as present at the following locations: A1, A2, B1, B2, C1, D1, E1 and E2. Reference map and preliminary results attached. Given the preliminary and limited nature of the sampling, there is not enough evidence to exclude the area around C2 or D2. Otherwise, we recommend that core samples of sediment surface at a deeper depth be taken at locations C2 and D2. The recent surface sampling by Ekman dredge may have only collected recent deposits over the waste fill. These locations are in the depositional portion of the San Jacinto River.

3. The proposed time critical containment alternative should be hydraulically modeled to ensure it does not cause a flood impact on the surrounding community, as the site is located in an area in which the river is already constricted.

4. If the 100-year (1%) flow area under the I-10 bridge is constricted due to the chosen time critical containment alternative, an analysis should be conducted to determine if the additional constriction affects the bridge's stability due to the additional river scour

introduced. No alternative should be allowed that could adversely impact the I-10 bridge's stability.

Thank you for the opportunity to provide comments to guide the design of the Time Critical Removal Action. We look forward to contributing to the Superfund process through future reviews. Should you have questions about these comments, please contact Steve Hupp, Administrator – Water and Solid Waste Programs at 713-439-6261 or by email at shupp@hcphes.org.

Sincerely,

Herminia Palacio, MD, MPH
Executive Director

cc: Ed Emmett, Harris County Judge
Commissioner Sylvia Garcia, Harris County Precinct Two
Vince Ryan, Harris County Attorney
John Blount, P.E., Architecture and Engineering Division